

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

First Class Mail and Periodicals
Service Standard Changes, 2021

Docket No. N2021-1

**RESPONSES OF AMERICAN POSTAL WORKERS UNION, AFL-CIO WITNESS
STEPHEN DEMATTEO TO UNITED STATES POSTAL SERVICE'S
INTERROGATORIES AND REQUESTS FOR THE PRODUCTION OF DOCUMENTS
(USPS/APWU-RT2-1 TO -6)
(June 14, 2021)**

In accordance with 39 C.F.R. § 3020.117(b), the APWU provides these responses of witness Stephen DeMatteo to the above-listed interrogatories and requests for production of documents. Each interrogatory is re-stated verbatim and followed by the response.

Respectfully Submitted,

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USPS/APWU-RT2-1: On page 2 of your testimony, lines 8 to 12, you state “As part of our efforts to educate and engage postal workers and the public about the implications of the present proposed changes in service standards for First-Class Mail and Periodicals, we shared with the public the opportunity to submit comments to the Postal Service’s Federal Register Notice Request for Comments on its regulatory changes to service standards for market-dominant mail products.”

- a. Please describe in detail each of your efforts to educate and engage postal workers and the public about the implications of the proposed changes, including the method or methods used to reach the public and to whom you directed your outreach.
- b. Please describe in detail the (i) how you chose which individuals and organizations to solicit for comment, (ii) whether those individuals and organizations were solicited for the purpose of gathering information to include in your testimony, and (iii) the selection process used to identify those comments that you considered worthwhile to include in your testimony.
- c. Please describe in detail the comments received that you decided not to include in your summary of comments received, and the reason or reasons why you chose not to include them.
- d. Please describe in detail the (i) information shared with the public about how to submit comments to the Postal Service’s Federal Register Notice Request for Comments, and (ii) the methodology the APWU used to determine those individuals and organizations from which to solicit comments for inclusion in your testimony.
- e. Please produce any documents provided to the public and/or your members to educate them about the proposed service standard change, or to solicit comments, sent by any means, and including but not limited to direct mailings and/or electronic communications, educational materials, solicitations for comments, or suggested language to include in comments.

RESPONSE:

a and b. Since the service standard changes were announced, I have had several meetings with representatives of other organizations about the rulemaking and the present case before the Commission. We did not ask specific individuals to comment, but shared information about the Postal Service’s service standard changes and how individuals or organizations could express their opinions through the notice and comment process. We emailed information on how to submit comments to two email lists, an APWU email list and a U.S. Mail Not For Sale campaign email list. Both lists include emails of postal workers and non-postal workers and there were approximately

3,500 comments that appear to have been made as a result of emails to the APWU list.

See also response to 1(e).

c. I reviewed as many copies of the comments as I could and organized them by common themes for my testimony. None of the comments I reviewed were in favor of the Postal Service's service standard changes.

d. See response 1(a), (b) and (e). The default language for the comment that individuals could change or personalize is as follows:

Like so many people I know, I depend on reliable and affordable postal services in many areas of my life.

Whether it's paying bills and receiving checks, ordering medicine or gifts, or sending a message to a loved one, the Postal Service is critical to keeping us all connected.

I am opposed to the proposed service standard changes which would permanently slow down the delivery of much of our mail. The Postal Service's focus should be on improving on the delays that plagued the service in the past year, not making those delays permanent.

The Postal Service plays an important role in the life of the country. It's no wonder that postal workers and the Postal Service are consistently ranked among the most trusted and reliable institutions in the country.

Let's keep it that way, and keep the mail arriving reliably and quickly for years to come. We need it to.

e. Attached at Exhibit A and B are the emails sent by the APWU about submitting comments to the APWU email list and the U.S. Mail Not For Sale email list. Exhibit C are the suggestions on how to create a comment.

USPS/APWU-RT2-2(a): On page 2 of your testimony, lines 13 to 14 you state “Using an online tool, individuals can submit their comments directly to the Postal Service’s comment email address, with a copy of their message shared with the APWU.”

- a. Please describe the online tool, including its name, the software program used, any associated web address, and how it was developed to provide comments to the Postal Service with a copy of the comment sent to the APWU.
- b. Please describe how comments submitted through the online tool are conveyed to the Postal Service in response to its solicitation for comments on its proposed rule-making.
- c. Please provide documents related to the online tool, including but not limited to user manuals, guidance documents, and screen shots of the website.

RESPONSE:

- a. Action Network is the online tool and software program we used to provide information and a method for submitting comments. The Action Network web address is www.actionnetwork.org.
- b. Through Action Network, individuals’ emails were sent directly to the email address listed in the Federal Register.
- c. See Exhibits A - C.

USPS/APWU-RT2-3: On page 2 of your testimony, lines 15 to 17, you state, “We educated several other organizations about the service standard changes, some of whom replicated the online tool and circulated it among their members and constituents. They in turn shared the comments collected through their channels with us.”

- a. Please provide the name of each organization that you educated about the service standard changes.
- b. Please provide the name of each organization that replicated the online tool, and the email and/or website address provided to their constituents for submitting comments to the Postal Service.
- c. Please describe in detail the solicitation method or methods used by each organization to gather comments from the public for purposes of gathering information for your testimony, including whether members of any organizations and/or groups were solicited for comment and identify those organizations or groups.
- d. Please provide information on how many of the comments the APWU received came from another organization, and the number received from each organization that replicated the online tool.
- f. Please provide any documents the identified organizations provided to the public or their members to educate them about the proposed service standard change, or to solicit comments, sent by any means, including educational materials, solicitations for comments, or suggested language to include in comments.

RESPONSE:

a, b and c. To my knowledge, based on information the APWU provided, the following organizations and campaigns sent out the comment tool to their own email lists:

Alliance for Retired Americans
Americans for Tax Fairness
Coalition on Human Needs
Daily Kos
Data for Progress
Demand Progress
Drug Prices are Too High
Hip Hop Caucus
Juggernaut
LeftNet
Other98
Progress America
Progressive Reform Network
Social Security Works
The Zero Hour
US Mail Not for Sale
Watchdog.net
Blue Future

Crazy Eight PAC
Iron PAC
Melanie Darrigo
Progress America
Rep. Rashida Tlaib
Ruth Luevanos
The Six PAC

d. The APWU did not receive comments from another organization.

[sic – no question USPS/APWU RT2-3 (e) in original interrogatories]

f. I have no personal knowledge and am not in possession of the information requested and accordingly cannot answer.

USPS/APWU-RT2-4: On page 4 of your testimony, lines 11 to 13, and page 4, lines 1 to 2, you state, “To my knowledge, the volume and pace of comments is unusually high for such a public comment process. By comparison, for example, the December 15, 2011 Notice of Proposed Rulemaking for Service Standards for Market-Dominant Mail Products resulted in 4,200 comments in response to an Advance Notice of Proposed Rulemaking, and 101 written comments in response to the Notice of Proposed Rulemaking itself.”

a. Please describe in detail any similar outreach measures as described in your testimony that were taken with respect to the 2011 Proposed Rulemaking, and whether the APWU utilized a similar online tool to permit individuals to submit comments directly to the Postal Service with a copy to the APWU.

b. Please produce any documents provided to the public to educate them about the 2011 Proposed Rulemaking, or to solicit comments, sent by any means, including but not limited to direct mailings or electronic communications.

c. If the APWU utilized a similar online tool to solicit comments in 2011, please produce any documents related to that online system including but not limited to manuals and screen shots of the website used to solicit, submit or collect comments.

RESPONSE:

a, b and c. Based on information gathered in the course of my employment, the APWU did not undertake a similar outreach measure with respect to the 2011 Proposed Rulemaking.

USPS/APWU-RT2-5: On page 5 of your testimony, line 9, you state that the “comments were nearly unanimous,” and on lines 19-20, you state that “key themes were expressed in the comments.” For each of these statements, identify how many “comments” were received, how many were reviewed and how many you are referring to in each reference.

RESPONSE:

My testimony refers to the comments I reviewed, not the entirety of the tens of thousands of comments I am aware were submitted. I reviewed dozens of individual comments, but do not know the exact number for each of the themes I described other than to say that I believe there were more than twenty comments expressing each theme I described. To the best of my knowledge, all of the comments are in the Postal Service’s possession.

USPS/APWU-RT2-6: Please provide a list of each comment received by the APWU, and for each:

- a. describe any identifying information such as whether the commenter is an individual or a business; and
- b. describe any known affiliation of the commenter (e.g., whether they or an individual in their family are a member of the APWU).

RESPONSE:

a and b. See the library reference file filed on June 14, 2021, with a list of each comment and the identifying information we collected for each comment the APWU received a copy of. We cannot immediately identify who of the commenters are APWU members, but will amend the library reference once we have verified the membership status of the commenters.

EXHIBIT A

Send a message: Stop the Mail Slowdown

As postal workers, we need to take action. Postal management is now trying to permanently slow down the delivery of our mail. USPS has announced slowdowns to their "service standards", which are the on-time delivery targets for different kinds of mail.

They are attempting to change First Class Mail and end-to-end periodicals from 1-3 days, depending on the delivery distance to as long as five days for both first class and periodicals delivery.

Before these changes become permanent, USPS must first engage in two public reviews: a Federal Register rule-making process and an advisory opinion by the Postal Regulatory Commission (PRC). Your comment will be emailed directly to the Federal Register, and if submitted by May 28, will also be included in the PRC submissions.

Your submission will have more impact if you briefly tell your story of why prompt delivery by the Postal Service is important to you, as a postal worker, and your community.

SPONSORED BY
 APWU National

ENTER YOUR RETURN ADDRESS

We've got your address, Graham!
[Not Graham? Click here.](#)

☐ Check if you are an APWU member

START WRITING

You may receive email updates from APWU National, the sponsor of this letter campaign.

[Edit Subscription Preferences](#)

EXHIBIT B



Send a message: Stop the Mail Slowdown

After a year when unprecedented mail delays outraged the country, Postal management is now trying to permanently slow down the delivery of our mail. USPS has announced slowdowns to their "service standards", which are the on-time delivery targets for different kinds of mail.

Today, First Class Mail is supposed to be delivered within 1-3 days, depending on the delivery distance. Under the new proposed rules, this delivery time could be as long as 5 days for both first class and periodicals delivery.

Before these changes become permanent, USPS must first engage in two public reviews: a Federal Register rule-making process and an advisory opinion by the Postal Regulatory Commission (PRC). Your comment will be emailed directly to the Federal Register, and if submitted by May 28, will also be included in the PRC submissions.

Your submission will have more impact if you briefly tell your story of why prompt delivery by the Postal Service is important to you and your community.

By entering your mobile number, you agree to receive text messages from USMailNotForSale, A Grand Alliance & their constituent organizations. Message & Data rates may apply.
[Privacy Policy](#)

ENTER YOUR RETURN
ADDRESS

We've got your address, Graham!
Not Graham? [Click here.](#)

START WRITING

You may receive email updates from *US Mail Not For Sale*,
the sponsor of this letter campaign.

[Edit Subscription Preferences](#)

EXHIBIT C



Send a message: Stop the Mail Slowdown

Your submission will have more impact if you briefly tell your story of why prompt delivery by the Postal Service is important to you and your community. Please personalize the body of the message but not the subject line.

Tips for Personalizing:

- When you make your submission, think about the community you live in. What groups are you a part of that rely on the mail? Is your community particularly underserved by local stores and other services?
- Do you rely on the Postal Service for medications? Do you run a business that needs prompt delivery by the Postal Service to survive and prosper? How would it impact you if you had to wait longer?
- USPS managers admitted that they hadn't looked into the impact of these changes on racial equity, rural versus urban populations, low income communities, veterans or elderly communities. Do you have insight into how slowing the mail will affect them?
- Finally, the USPS is also seeking approval to raise prices for postal customers and has not looked at the combined effect of raising prices and slowing delivery. Whether you

WRITE YOUR LETTER

Welcome back,
Jane !

Not Jane ? Wrong recipients? [Click here](#).

WRITE TO USPS FEDERAL REGISTER

YOUR LETTER

YOUR LETTER SUBJECT
Service Standards fo

YOUR MESSAGE
Like so many people I know, I depend on reliable and affordable postal services in many areas of my life. Whether it's paying bills and receiving checks

SEND LETTER

have a business, provide services through the mail or are an individual postal customer, what do you think about the prospect of paying more money for slower service?

Please note: By filling out this form, your name, address and comment will be submitted to the Federal Register and the Postal Regulatory Commission will be posted on the Regulations.gov website. Make a difference and let your voice be heard!

By entering your mobile number, you agree to receive text messages from USMailNotForSale, A Grand Alliance & their constituent organizations. Message & Data rates may apply.

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